

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
Attn: Laura Peters



RE: Comments on Draft 2014 Water-Energy Grant Program Guidelines and Proposal Solicitation Package

Dear Ms. Peters,

On behalf of the Sierra Nevada Alliance, we write to provide comments on the Draft 2014 Water-Energy Grant Program Guidelines and Proposal Solicitation Package. Since 1993 the Sierra Nevada Alliance has been protecting and restoring Sierra lands, water, wildlife and communities. Our mission is to protect and restore the natural resources of the Sierra Nevada for future generations while promoting sustainable communities. We are truly an Alliance, with over ninety-five Member Groups and nearly 10,000 individuals that span the entire 400 mile mountain range. Our member groups work on a broad range of conservation issues including watersheds and energy. We also work with and coordinate all 12 of the Sierra Region Integrated Regional Water Management (IRWM) groups through the Sierra Water Workgroup.

As you know, over 60% of California's developed water comes from Sierra watersheds. The Sierra Nevada region is home to a disproportionately large number of disadvantaged communities (DACs). Using the median household income (MHI) indicator, our region's income is at or below 80% of the state's (MHI). According to 2010 Census Data, over 40% of the range's (based on Sierra Nevada Conservancy's boundary) communities and nearly 70% of our individual residents lives in disadvantaged communities, which is concerning as compared to other regions of the state. Given the geographically dispersed nature of the range, disadvantaged communities within the Sierra lack the resources necessary to adequately quantify, monitor and protect their resources. The Sierra Nevada region accounts for about 22% of California's land area, but less than 7% of the state's population. This makes it very difficult for Sierra sustainability efforts to compete with large population centers.

The Water-Energy Grant Program will provide much-needed funding for communities across California and we thank you for this opportunity to provide input. Our top concerns with the Draft are the proposed Proposal Ranking and DAC criteria. The CalEnviroScreen tool is not a good indicator of disadvantagedness because it almost exclusively precludes Sierra Nevada and other rural areas in the state. Median household income (MHI) should be the primary indicator for directing funding to DACs. The second concern we have is that my using absolute values for water, energy, and greenhouse gas reductions, few or no rural communities will rank high enough to receive any of the limited funding. We suggest using a per capita reduction as the primary ranking criteria, not absolute numbers.

In order to equitably distribute these important and limited grant funds, median household income must be the primary indicator of whether a community is disadvantaged; and reductions in water, energy, and greenhouse gases must be measured per capita instead of as an absolute number.

We thank you for taking public comments and look forward to the release of the final solicitation.

Gavin Feiger
Senior Associate

